

**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL SERVICES**

STATEMENT OF BASIS¹

PROPOSED PART 70 OPERATING PERMIT 2261-V4

**ANILINE COMPLEX
RUBICON LLC
GEISMAR, ASCENSION PARISH, LOUISIANA
Agency Interest (AI) No. 1468
Activity No. PER20090003**

I. APPLICANT

The applicant is: Rubicon LLC
PO Box 517
Geismar, LA 70734-0517

Facility: Aniline Complex

SIC Code: 2869

Location: 9156 Highway 75, Geismar, LA 70734

II. PERMITTING AUTHORITY

The permitting authority is: Louisiana Department of Environmental Quality
Office of Environmental Services
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313

III. CONTACT INFORMATION

Additional information may be obtained from:

Mr. Fritz Hurst
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313
Phone: (225) 219-3125

IV. FACILITY BACKGROUND AND CURRENT PERMIT STATUS

Rubicon LLC is a chemical manufacturer of a variety of organic and inorganic chemicals at their Geismar Facility and has been in operation since 1966. Aniline Complex consists of the Nitrobenzene I, Nitrobenzene II, Aniline II, and Aniline III production units. The facility currently operates under Permit No. 2261-V3, issued on July 9, 2008. This will be the Renewal/Modification Part 70 permit for the Rubicon Complex.

¹ 40 CFR 70.7(a)(5) and LAC 33:III.531.A.4 require the permitting authority to "provide a statement that sets forth the legal and factual basis for the proposed permit conditions of any permit issued to a Part 70 source, including references to the applicable statutory or regulatory provisions."

STATEMENT OF BASIS

ANILINE COMPLEX RUBICON LLC GEISMAR, ASCENSIN PARISH, LOUISIANA Agency Interest (AI) No. 1468 Activity No. PER20090003 Proposed Permit No. 2261-V4

The Rubicon Complex is presently operating under Permit No. 2261-V3, issued December 2, 2008.

This permit addresses all emissions unit at the Rubicon Complex.

A number of Part 70 permits addressing other process units at the Rubicon Complex have already been issued. These include:

| Permit No. | Process Unit | Date Issued |
|------------|------------------------|-------------|
| 2391-V10 | MDI Plant | 09/17/2009 |
| 2261-V3 | Aniline Complex | 12/02/2008 |
| 2010-V1 | Polyols Plant | 03/22/2010 |
| 2420-V2 | Offsites Area | 08/21/2009 |
| 2278-V1 | Reduction Plant | 07/21/2009 |
| 3037-V1 | Maleic Anhydride Plant | 08/13/2008 |

V. PROPOSED PERMIT/PROJECT INFORMATION

A permit application and Emission Inventory Questionnaire (EIQ) dated February 16, 2009, were received requesting a permit renewal/modification. The application was deemed administratively complete in accordance with LAC 33:III.519.A on March 26, 2009.

Process Description

The Aniline Complex consists of the Nitrobenzene I and II, and Aniline II and III production units. This is a Synthetic Organic Chemical Manufacturing Industry (SOCMI) chemical manufacturing process unit (CMPU) which produces Nitrobenzene and Aniline.

Nitrobenzene Process

Nitrobenzene is produced at Rubicon by nitrating benzene in the presence of a large volume of mixed acid in a series of nitrators. Additional functional systems involved in the production of nitrobenzene include sulfuric acid concentrators to reconcentrate sulfuric acid, washers to remove water-soluble salts, a vent system benzene stripper to remove excess benzene from the product, a nitrogen oxides (NO_x) column to scrub NO_x formed in the process, a benzene scrubber to absorb benzene in the vent gas and a centrifuge unit for maximum removal of water from the product.

STATEMENT OF BASIS

ANILINE COMPLEX RUBICON LLC GEISMAR, ASCENSIN PARISH, LOUISIANA Agency Interest (AI) No. 1468 Activity No. PER20090003 Proposed Permit No. 2261-V4

Aniline Process

Aniline is produced at Rubicon by reacting nitrobenzene and hydrogen in the presence of powdered nickel catalyst to form crude aniline. Additional functional systems involved in the production of aniline include a dehydration section to remove impurities that boil at low temperature, a refining section to remove impurities that boil at high temperature, a purge still section where aniline is recovered from the wet and dry residue streams, an amine water/vent scrubber system to recover nitrobenzene and aniline from the wastewater streams and a boiler to incinerate waste gaseous and liquid waste streams.

Proposed Modifications

The proposed modifications for the Aniline Complex are as follows:

1. Move the Sulfuric Acid Pump Tanks (MS-2120A-B/EQT058, MS-2720/EQT1097), and the Wash Water Tank (MF-2100/EQT1057) to insignificant activities;
2. Revise the maximum design capacity of insignificant activity source YB from 55 gallons to 110 gallons;
3. Revise the maximum design capacity of insignificant activity source QJ from 564 gallons to 1500 gallons;
4. Add the VOC separator, Dry NB Coalescer Separator (GY-2186/EQT1215), as a listed source;
5. Add surge vessels, MS-2159/EQT1207, MS-2725/EQT1208, MS-2511/EQT1209, MS-2524/EQT1210, MS-2227/EQT1211, MS-2251/EQT1212, MS-2231/EQT1213, and MS-2224/EQT1214 as listed sources;
6. Add five demounts, Eurotainers A, B, C, D, and E, as insignificant activities;
7. Combine Aniline Complex Wastewater (EQT1130), Maintenance Wastewater (EQT1131) and Benzene-Containing Wastewater (EQT1132) as one listed source, Aniline Complex Wastewater (EQT1130); and
8. Revise the fugitive emissions for the Aniline Complex (Emission Point QD/FUG0028).

VI. ATTAINMENT STATUS OF PARISH

| <u>Pollutant</u> | <u>Attainment Status</u> | <u>Designation</u> |
|-------------------|--------------------------|--------------------|
| PM _{2.5} | Attainment | N/A |
| PM ₁₀ | Attainment | N/A |
| SO ₂ | Attainment | N/A |
| NO ₂ | Attainment | N/A |
| CO | Attainment | N/A |

STATEMENT OF BASIS

ANILINE COMPLEX
RUBICON LLC
GEISMAR, ASCENSIN PARISH, LOUISIANA
Agency Interest (AI) No. 1468
Activity No. PER20090003
Proposed Permit No. 2261-V4

| | | |
|--------------------|--------------------------|--------------|
| Ozone ² | Attainment/Nonattainment | N/A / Status |
| Lead | Attainment | N/A |

VII. PERMITTED AIR EMISSIONS

Sources of air emissions are listed on the "Inventories" page of the proposed permit.

Estimated emissions of criteria pollutants from the facility, in tons per year (TPY), are as follows:

| <u>Pollutant</u> | <u>Before</u> | <u>After</u> | <u>Change</u> |
|------------------|---------------|--------------|---------------|
| PM ₁₀ | 21.79 | 21.79 | - |
| SO ₂ | - | - | - |
| NO _x | 277.49 | 277.14 | - 0.35 |
| CO | 5.93 | 5.93 | - |
| VOC | 35.43 | 34.87 | - 0.56 |

VOC compounds classified as LAC 33:III.Chapter 51-regulated toxic air pollutants (TAP) are speciated below. This list encompasses all Hazardous Air Pollutants (HAP) regulated pursuant to Section 112 of the Clean Air Act. Note, however, all TAPs are not HAPs (e.g., ammonia, hydrogen sulfide).

² VOC and NO_x are regulated as surrogates.

STATEMENT OF BASIS

ANILINE COMPLEX
RUBICON LLC
GEISMAR, ASCENSIN PARISH, LOUISIANA
Agency Interest (AI) No. 1468
Activity No. PER20090003
Proposed Permit No. 2261-V4

LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

| Pollutant | Before | After | Change |
|-------------------------------|--------|--------|--------|
| Ammonia | 2.41 | 2.41 | - |
| Aniline | 12.34 | 9.86 | - 2.48 |
| Benzene | 14.86 | 15.67 | + 0.81 |
| Chlorine | 0.03 | 0.03 | - |
| Chlorinated Dibenzo Furans | 0.001 | 0.001 | - |
| Chlorinated Dibenzo-P-Dioxins | 0.001 | <0.001 | - |
| Hydrochloric Acid | 0.02 | 0.02 | - |
| Nitrobenzene | 4.58 | 5.49 | + 0.91 |
| Phenol | 0.15 | 0.14 | - 0.01 |
| Ortho-Toluidine | 0.06 | 0.06 | - |
| Total | 34.45 | 33.68 | - 0.77 |

Other Non-Tap VOC:

1.19

** Metals:

| | Before | After | Change |
|-----------------------------|--------|-------|--------|
| Antimony (and Compounds) | 0.01 | 0.01 | - |
| Arsenic (and Compounds) | 0.002 | 0.002 | - |
| Barium (and Compounds) | 0.01 | 0.01 | - |
| Beryllium | 0.002 | 0.002 | - |
| Cadmium (and Compounds) | 0.002 | 0.002 | - |
| Chromium VI (and Compounds) | 0.002 | 0.002 | - |
| Lead | 0.004 | 0.004 | - |
| Mercury (and Compounds) | 0.001 | 0.001 | - |
| Nickel (and Compounds) | 1.80 | 1.80 | - |
| Silver | 0.002 | 0.002 | - |
| Thallium | 0.004 | 0.004 | - |

STATEMENT OF BASIS

ANILINE COMPLEX RUBICON LLC GEISMAR, ASCENSIN PARISH, LOUISIANA Agency Interest (AI) No. 1468 Activity No. PER20090003 Proposed Permit No. 2261-V4

Aniline Complex is a major source of criteria pollutants, a minor source of HAPs, and a major source of TAPs.

Permitted limits for individual emissions units and groups of emissions units, if applicable, are set forth in the tables of the proposed permit entitled "Emission Rates for Criteria Pollutants" and "Emission Rates for TAP/HAP & Other Pollutants." These tables are part of the permit.

Emissions calculations can be found in Section 3 of the permit application. The calculations address the manufacturer's specifications, fuel composition (e.g., sulfur content), emissions factors, and other assumptions on which the emissions limitations are based and have been reviewed by the permit writer for accuracy.

General Condition XVII Activities

Very small emissions to the air resulting from routine operations that are predictable, expected, periodic, and quantifiable and that are submitted by the applicant and approved by the Air Permits Division are considered authorized discharges. These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. However, such emissions are considered when determining the facility's potential to emit for evaluation of applicable requirements. Approved General Condition XVII activities are noted in Section VIII of the proposed permit.

Insignificant Activities

The emissions units or activities listed in Section IX of the proposed permit have been classified as insignificant pursuant to LAC 33:III.501.B.5. By such listing, the LDEQ exempts these sources or types of sources from the requirement to obtain a permit under LAC 33:III.Chapter 5. However, such emissions are considered when determining the facility's potential to emit for evaluation of applicable requirements.

VIII. REGULATORY APPLICABILITY

Regulatory applicability is discussed in three sections of the proposed permit: Section X (Table 1), Section XI (Table 2), and Specific Requirements. Each is discussed in more detail below.

Section X (Table 1): Applicable Louisiana and Federal Air Quality Requirements

Section X (Table 1) summarizes all applicable federal and state regulations. In the matrix, a "1" represents a regulation applies to the emissions unit. A "1" is also used if the emissions unit is exempt from the emissions standards or control requirements of the regulation, but monitoring, recordkeeping, and/or reporting requirements apply.

STATEMENT OF BASIS

ANILINE COMPLEX RUBICON LLC GEISMAR, ASCENSIN PARISH, LOUISIANA Agency Interest (AI) No. 1468 Activity No. PER20090003 Proposed Permit No. 2261-V4

A “2” is used to note that the regulation has requirements that would apply to the emissions unit, but the unit is exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified, or reconstructed since the regulation has been effective. If the specific criterion changes, the emissions unit will have to comply at a future date. Each “2” entry is explained in Section XI (Table 2).

A “3” signifies that the regulation applies to this general type of source (e.g., furnace, distillation column, boiler, fugitive emissions, etc.), but does not apply to the particular emissions unit. Each “3” entry is explained in Section XI (Table 2).

If blank, the regulation clearly does not apply to this type of emissions unit.

Section XI (Table 2): Explanation for Exemption Status or Non-Applicability of a Source

Section XI (Table 2) of the proposed permit provides explanation for either the exemption status or non-applicability of given federal or state regulation cited by 2 or 3 in the matrix presented in Section X (Table 1).

Specific Requirements

Applicable regulations, as well as any additional monitoring, recordkeeping, and reporting requirements necessary to demonstrate compliance with both the federal and state terms and conditions of the proposed permit, are provided in the “Specific Requirements” section. Any operating limitations (e.g., on hours of operation or throughput) are also set forth in this section. Associated with each Specific Requirement is a citation of the federal or state regulation upon which the authority to include that Specific Requirement is based.

1. Federal Regulations

40 CFR 60 – New Source Performance Standards (NSPS)

The following subparts are applicable at the Facility: A, K, Kb, VV, NNN and RRR. Applicable emission standards, monitoring, test methods and procedures, recordkeeping, and reporting requirements are summarized in the “Specific Requirements” section of the proposed permit.

40 CFR 61 – National Emission Standards for Hazardous Air Pollutants (NESHAP)

The following subparts are applicable at the Facility: A, J, V, and FF. Applicable emission standards, monitoring, test methods and procedures, recordkeeping, and reporting requirements are summarized in the “Specific Requirements” section of the proposed permit.

STATEMENT OF BASIS

ANILINE COMPLEX RUBICON LLC GEISMAR, ASCENSIN PARISH, LOUISIANA Agency Interest (AI) No. 1468 Activity No. PER20090003 Proposed Permit No. 2261-V4

40 CFR 63 – Maximum Achievable Control Technology (MACT)

The following subparts are applicable at the Facility: A, F, G, H, EEE, and FFFF. Applicable emission standards, monitoring, test methods and procedures, recordkeeping, and reporting requirements are summarized in the “Specific Requirements” section of the proposed permit.

Clean Air Act §112(g) or §112(j) – Case-By-Case MACT Determinations

A case-by-case MACT determination pursuant to §112(g) or §112(j) of the Clean Air Act was not required.

2. SIP-Approved State Regulations

Applicable state regulations are also noted in Section X (Table 1) of the proposed permit. Some state regulations have been approved by the U.S. Environmental Protection Agency (EPA) as part of Louisiana’s State Implementation Plan (SIP). These regulations are referred to as “SIP-approved” and are enforceable by both LDEQ and EPA. All LAC 33:III.501.C.6 citations are federally enforceable unless otherwise noted.

3. State-Only Regulations

Individual chapters or sections of LAC 33:III noted by an asterisk in Section X (Table 1) are designated “state-only” pursuant to 40 CFR 70.6(b)(2). Terms and conditions of the proposed permit citing these chapters or sections are not SIP-approved and are not subject to the requirements of 40 CFR Part 70. These terms and conditions are enforceable by LDEQ, but not EPA. All conditions not designated as “state-only” are presumed to be federally enforceable.

State MACT (LAC 33:III.Chapter 51)

Aniline Complex is a major source of LAC 33:III.Chapter 51 regulated TAP. The owner or operator of any major source that emits or is permitted to emit a Class I or Class II TAP at a rate equal to or greater than the Minimum Emission Rate (MER) listed for that pollutant in LAC 33:III.5112 shall control emissions of that TAP to a degree that constitutes Maximum Achievable Control Technology (MACT), except that compliance with an applicable federal standard promulgated by the U.S. EPA in 40 CFR Part 63 shall constitute compliance with MACT for emissions of toxic air pollutants. Applicable Part 63 standards are addressed in Section VIII.1 of this Statement of Basis. MACT is not required for Class III TAPs; however, the impact of all TAP emissions must be below their respective Ambient Air Standards (AAS).

MACT determinations were made pursuant to Chapter 51 for the following emissions units: F, G, and H. State MACT requirements are cited as LAC 33:III.5109.A in the proposed permit.

STATEMENT OF BASIS

ANILINE COMPLEX RUBICON LLC GEISMAR, ASCENSIN PARISH, LOUISIANA Agency Interest (AI) No. 1468 Activity No. PER20090003 Proposed Permit No. 2261-V4

IX. NEW SOURCE REVIEW (NSR)

1. Prevention of Significant Deterioration (PSD)

The facility's source category is listed in Table A of the definition of "major stationary source" in LAC 33:III.509. As such, the PSD major source threshold is 100/250 TPY (of any regulated NSR pollutant).

Aniline Complex is not classified as a major stationary source under the PSD program. Thus, PSD review is not required.

2. Nonattainment New Source Review (NNSR)

Because NO_x and VOC emissions from the Aniline Complex are less than 50 TPY, the facility is not classified as a major stationary source under the NNSR program, LAC 33:III.504. Thus, NNSR review is not required.

3. Reasonable Possibility

As previously mentioned, increases of PM/PM₁₀, SO₂, NO_x, CO, and VOC associated with the proposed project did not trigger PSD/NNSR review. Because the applicant elected to use "potential to emit" in lieu of "projected actual emissions" to determine the project increase, there is no "reasonable possibility" that the proposed project may result in a significant emissions increase.

X. ADDITIONAL MONITORING AND TESTING REQUIREMENTS

In addition to the monitoring and testing requirements set forth by applicable state and federal regulations (see Section VIII of this Statement of Basis), a number of "LAC 33:III.507.H.1.a" and/or "LAC 33:III.501.C.6" conditions may appear in the "Specific Requirements" section of the proposed permit. These conditions have been added where no applicable regulation exists or where an applicable regulation does not contain sufficient monitoring, recordkeeping, and/or reporting provisions to ensure compliance. LAC 33:III.507.H.1.a provisions, which may include recordkeeping requirements, are intended to fulfill Part 70 periodic monitoring obligations under 40 CFR 70.6(a)(3)(i)(B).

XI. OPERATIONAL FLEXIBILITY

Emissions Caps

An emissions cap is a permitting mechanism to limit allowable emissions of two or more emissions units below their collective potential to emit (PTE). The proposed permit does not establish an emissions cap.

STATEMENT OF BASIS

ANILINE COMPLEX RUBICON LLC GEISMAR, ASCENSIN PARISH, LOUISIANA Agency Interest (AI) No. 1468 Activity No. PER20090003 Proposed Permit No. 2261-V4

Alternative Operating Scenarios

LAC 33:III.507.G.5 allows the owner or operator to operate under any operating scenario incorporated in the permit. Any reasonably anticipated alternative operating scenarios may be identified by the owner or operator through a permit application and included in the permit. The proposed permit does not include an alternative operating scenario.

Streamlined Requirements

When applicable requirements overlap or conflict, the permitting authority may choose to include in the permit the requirement that is determined to be most stringent or protective as detailed in EPA's "White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program" (March 5, 1996). The overall objective is to determine the set of permit terms and conditions that will assure compliance with all applicable requirements for an emissions unit or group of emissions units so as to eliminate redundant or conflicting requirements. The proposed permit does contain streamlined provisions.

Louisiana Consolidated Fugitive Emission Program (LCFEP)

Aniline Complex complies with a streamlined equipment leak monitoring program.

Compliance with the streamlined program shall constitute compliance with each of the fugitive emission monitoring programs being streamlined. Fugitive emissions are subject to the requirements of 40 CFR 63 Subpart H, 40 CFR 61 Subpart J and V, 40 CFR 60 Subpart VV, LAC 33:III.2122, and LAC 33:III.5109. Among these regulations, 40 CFR 63 Subpart H establishes the most stringent leak detection and repair standards. Therefore, fugitive emissions shall be monitored as required by this program.

| Unit or Plant Site | Programs Being Streamlined | Stream Applicability | Overall Most Stringent Program |
|--------------------|--|----------------------|--------------------------------|
| Aniline Complex | 40 CFR 63 Subpart H – HON | ≥ 5% VOHAP | 40 CFR 63 Subpart H |
| | NESHAP Subpart J & V | ≥ 10% VCM | |
| | 40 CFR 60 Subparts VV – NSPS for Equipment Leaks of VOC in SOCM I or Refineries | ≥ 10% VOC | |
| | LAC 33:III.2122 – Fugitive Emission Control for Ozone Nonattainment Areas and Specified Parishes | ≥ 10% VOC | |
| | LAC 33:III.5109 – Louisiana MACT Determination for Non-HON Sources | ≥ 5% VOTAP | |

STATEMENT OF BASIS

ANILINE COMPLEX RUBICON LLC GEISMAR, ASCENSIN PARISH, LOUISIANA Agency Interest (AI) No. 1468 Activity No. PER20090003 Proposed Permit No. 2261-V4

XII. PERMIT SHIELD

A permit shield, as described in 40 CFR 70.6(f) and LAC 33:III.507.I, provides an “enforcement shield” which protects the facility from enforcement action for violations of applicable federal requirements. It is intended to protect the facility from liability for violations if the permit does not accurately reflect an applicable federal or federally enforceable requirement.

The proposed permit does not establish a permit shield.

XIII. IMPACTS ON AMBIENT AIR

Emissions associated with the proposed Aniline Complex renewal/modification were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

Modeling of Aniline, Benzene, Nickel, Antimony, Chromium (IV), Nitrobenzene, and Barium is addressed in Section IX.1 of this Statement of Basis.

Modeling demonstrates that emissions from the Aniline Complex will not violate National Ambient Air Quality Standards (NAAQS) for criteria pollutants and Louisiana Ambient Air Standards (AAS) for toxic air pollutants. Therefore, Aniline Complex will not cause air quality impacts which could adversely affect human health or the environment.

| Pollutant | Time Period | Calculated Maximum Ground Level Conc. | NAAQS or AAS |
|---------------|-------------|--|---------------------------------|
| Aniline | 8-hour | 19.9257 $\mu\text{g}/\text{m}^3$ | 181.00 $\mu\text{g}/\text{m}^3$ |
| Benzene | 8-hour | 2.7338 $\mu\text{g}/\text{m}^3$ | 12.00 $\mu\text{g}/\text{m}^3$ |
| Nickel | 8-hour | 0.1148 $\mu\text{g}/\text{m}^3$ | 0.21 $\mu\text{g}/\text{m}^3$ |
| Antimony | 8-hour | 0.0112 $\mu\text{g}/\text{m}^3$ | 11.90 $\mu\text{g}/\text{m}^3$ |
| Chromium (VI) | 8-hour | 0.0005 $\mu\text{g}/\text{m}^3$ | 0.01 $\mu\text{g}/\text{m}^3$ |
| Nitrobenzene | 8-hour | 6.4792 $\mu\text{g}/\text{m}^3$ | 119.00 $\mu\text{g}/\text{m}^3$ |
| Barium | 8-hour | 0.0023 $\mu\text{g}/\text{m}^3$ | 11.90 $\mu\text{g}/\text{m}^3$ |

* Ambient air standard set forth in LAC 33:III.5112.

STATEMENT OF BASIS

ANILINE COMPLEX RUBICON LLC GEISMAR, ASCENSIN PARISH, LOUISIANA Agency Interest (AI) No. 1468 Activity No. PER20090003 Proposed Permit No. 2261-V4

XIV. COMPLIANCE HISTORY AND CONSENT DECREES

Rubicon LLC compliance history can be found in Section 15.a of the permit application. It must be disclosed per LAC 33:III.517.E and 517.D.12, if applicable.

No federal or state actions have been issued since the existing permit for the Rubicon LLC was issued.

XV. REQUIREMENTS THAT HAVE BEEN SATISFIED

The following state and/or federal obligations have been satisfied and are therefore not included as Specific Requirements.

| <u>Source ID</u> | <u>Citation</u> | <u>Description</u> |
|------------------|-----------------|--------------------|
| None | - | - |

XVI. OTHER REQUIREMENTS

Executive Order No. BJ 2008-7 directs all state agencies to administer their regulatory practices, programs, contracts, grants, and all other functions vested in them in a manner consistent with Louisiana's Comprehensive Master Plan for a Sustainable Coast and public interest to the maximum extent possible. If a proposed facility or modification is located in the Coastal Zone, LDEQ requires the applicant to document whether or not a Coastal Use Permit is required, and if so, whether it has been obtained. Coastal Use Permits are issued by the Coastal Management Division of the Louisiana Department of Natural Resources (LDNR).

The facility is not located in the Coastal Zone; therefore, a Coastal Use Permit is not required.

XVII. PUBLIC NOTICE/PUBLIC PARTICIPATION

Written comments, written requests for a public hearing, or written requests for notification of the final decision regarding this permit action may be submitted to:

Ms. Soumaya Ghosn
LDEQ, Public Participation Group
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313

STATEMENT OF BASIS

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Agency Interest (AI) No. 1468

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Proposed Permit No. 2261-V4

Written comments and/or written requests must be received prior to the deadline specified in the public notice. If LDEQ finds a significant degree of public interest, a public hearing will be held. All comments will be considered prior to a final permit decision.

LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The permit application, proposed permit, and this Statement of Basis are available for review at LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, Louisiana. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). Additional copies may be viewed at the local library identified in the public notice. The available information can also be accessed electronically via LDEQ's Electronic Document Management System (EDMS) on LDEQ's public website, www.deq.louisiana.gov.

Inquiries or requests for additional information regarding this permit action should be directed to the contact identified on page 1 of this Statement of Basis.

Persons wishing to be included on the public notice mailing list or for other public participation-related questions should contact LDEQ's Public Participation Group at P.O. Box 4313, Baton Rouge, LA 70821-4313; by e-mail at maillistrequest@ldeq.org; or contact LDEQ's Customer Service Center at (225) 219-LDEQ (219-5337). Alternatively, individuals may elect to receive public notices via e-mail by subscribing to LDEQ's Public Notification List Service at http://www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm.

Permit public notices can be viewed at LDEQ's "Public Notices" webpage, <http://www.deq.louisiana.gov/apps/pubNotice/default.asp>. Electronic access to each proposed permit and Statement of Basis current on notice is also available on this page. General information related to public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx.

STATEMENT OF BASIS

ANILINE COMPLEX RUBICON LLC GEISMAR, ASCENSIN PARISH, LOUISIANA Agency Interest (AI) No. 1468 Activity No. PER20090003 Proposed Permit No. 2261-V4

APPENDIX A - ACRONYMS

| | |
|--------------------------------|--|
| AAS | Ambient Air Standard (LAC 33:III.Chapter 51) |
| AP-42 | EPA document number of the Compilation of Air Pollutant Emission Factors |
| BACT | Best Available Control Technology |
| BTU | British Thermal Units |
| CAA | Clean Air Act |
| CAAA | Clean Air Act Amendments |
| CAM | Compliance Assurance Monitoring, 40 CFR 64 |
| CEMS | Continuous Emission Monitoring System |
| CMS | Continuous Monitoring System |
| CO | Carbon monoxide |
| COMS | Continuous Opacity Monitoring System |
| CFR | Code of Federal Regulations |
| EI | Emissions Inventory (LAC 33:III.919) |
| EPA | (United States) Environmental Protection Agency |
| EIQ | Emission Inventory Questionnaire |
| ERC | Emission Reduction Credit |
| FR | Federal Register or Fixed Roof |
| H ₂ S | Hydrogen sulfide |
| H ₂ SO ₄ | Sulfuric acid |
| HAP | Hazardous Air Pollutants |
| Hg | Mercury |
| HON | Hazardous Organic NESHAP |
| IBR | Incorporation by Reference |
| LAER | Lowest Achievable Emission Rate |
| LDEQ | Louisiana Department of Environmental Quality |
| M | Thousand |
| MM | Million |
| MACT | Maximum Achievable Control Technology |
| MEK | Methyl ethyl ketone |
| MIK | Methyl isobutyl ketone |
| MSDS | Material Safety Data Sheet |
| MTBE | Methyl tert-butyl ether |
| NAAQS | National Ambient Air Quality Standards |
| NAICS | North American Industrial Classification System (replacement to SIC) |
| NESHAP | National Emission Standards for Hazardous Air Pollutants |
| NMOC | Non-Methane Organic Compounds |

STATEMENT OF BASIS

ANILINE COMPLEX RUBICON LLC GEISMAR, ASCENSIN PARISH, LOUISIANA Agency Interest (AI) No. 1468 Activity No. PER20090003 Proposed Permit No. 2261-V4

APPENDIX A - ACRONYMS

| | |
|-------------------|--|
| NOx | Nitrogen Oxides |
| NNSR | Nonattainment New Source Review |
| NSPS | New Source Performance Standards |
| NSR | New Source Review |
| OEA | LDEQ Office of Environmental Assessment |
| OEC | LDEQ Office of Environmental Compliance |
| OES | LDEQ Office of Environmental Services |
| PM | Particulate Matter |
| PM10 | Particulate Matter less than 10 microns in nominal diameter |
| PM2.5 | Particulate Matter less than 2.5 microns in nominal diameter |
| ppm | parts per million |
| ppmv | parts per million by volume |
| ppmw | parts per million by weight |
| PSD | Prevention of Significant Deterioration |
| PTE | Potential to Emit |
| RACT | Reasonably Available Control Technology |
| RBLCL | RACT-BACT-LAER Clearinghouse |
| RMP | Risk Management Plan (40 CFR 68) |
| SICC | Standard Industrial Classification Code |
| SIP | State Implementation Plan |
| SO2 | Sulfur Dioxide |
| SOCMI | Synthetic Organic Chemical Manufacturing Industry |
| TAP | Toxic Air Pollutants (LAC 33:III.Chapter 51) |
| TOC | Total Organic Compounds |
| TPY | Tons Per Year |
| TRS | Total Reduced Sulfur |
| TSP | Total Suspended Particulate |
| µg/m ³ | Micrograms per Cubic Meter |
| UTM | Universal Transverse Mercator |
| VOC | Volatile Organic Compound |
| VOL | Volatile Organic Liquid |
| VRU | Vapor Recovery Unit |

STATEMENT OF BASIS

ANILINE COMPLEX RUBICON LLC GEISMAR, ASCENSIN PARISH, LOUISIANA Agency Interest (AI) No. 1468 Activity No. PER20090003 Proposed Permit No. 2261-V4

APPENDIX B – GLOSSARY

Best Available Control Technologies (BACT) – an emissions limitation (including a visible emission standard) based on the maximum degree of reduction for each pollutant subject to regulation under this Part (Part III) which would be emitted from any proposed major stationary source or major modification which the administrative authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes or available methods, systems, and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of such pollutant.

CAM - Compliance Assurance Monitoring – A federal air regulation under 40 CFR Part 64.

Carbon Monoxide (CO) – (Carbon monoxide) a colorless, odorless gas produced by incomplete combustion of any carbonaceous (gasoline, natural gas, coal, oil, etc.) material.

Cooling Tower – A cooling system used in industry to cool hot water (by partial evaporation) before reusing it as a coolant.

Continuous Emission Monitoring System (CEMS) – The total combined equipment and systems required to continuously determine air contaminants and diluent gas concentrations and/or mass emission rate of a source effluent.

Cyclone – A control device that uses centrifugal force to separate particulate matter from the carrier gas stream.

Federally Enforceable Specific Condition – A federally enforceable specific condition written to limit the potential to Emit (PTE) of a source that is permanent, quantifiable, and practically enforceable. In order to meet these requirements, the draft permit containing the federally enforceable specific condition must be placed on public notice and include the following conditions:

- A clear statement of the operational limitation or condition which limits the source's potential to emit;
- Recordkeeping requirements related to the operational limitation or condition;
- A requirement that these records be made available for inspection by LDEQ personnel;
- A requirement to report for the previous calendar year.

Grandfathered Status – those facilities that were under actual construction or operation as of June 19, 1969, the signature date of the original Clean Air Act. These facilities are not required to obtain a permit. Facilities that are subject to Part 70 (Title V) requirements lose grandfathered status and must apply for a permit.

STATEMENT OF BASIS

ANILINE COMPLEX RUBICON LLC GEISMAR, ASCENSIN PARISH, LOUISIANA Agency Interest (AI) No. 1468 Activity No. PER20090003 Proposed Permit No. 2261-V4

APPENDIX B – GLOSSARY

Lowest Achievable Emission Rate (LAER) – for any source, the more stringent rate of emissions based on the following:

- a. the most stringent emissions limitation that is contained in the implementation plan of any state for such class or category of major stationary source, unless the owner or operator of the proposed stationary source demonstrates that such limitations are not achievable; or
- b. the most stringent emissions limitation that is achieved in practice by such class or category of stationary source. This limitation, when applied to a modification, means the lowest achievable emissions rate for the new or modified emissions units within the stationary source. In no event shall the application of this term permit a proposed new or modified major stationary source to emit any pollutant in excess of the amount allowable under an applicable new source standard of performance.

NESHAP – National Emission Standards for Hazardous Air Pollutants – Air emission standards for specific types of facilities, as outlined in 40 CFR Parts 61 through 63.

Maximum Achievable Control Technology (MACT) – the maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

NSPS – New Source Performance Standards – Air emission standards for specific types of facilities, as outlined in 40 CFR Part 60.

New Source Review (NSR) – a preconstruction review and permitting program applicable to new or modified major stationary sources of criteria air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C (“Prevention of Significant Deterioration of Air Quality”) and D (“Nonattainment New Source Review”).

Nonattainment New Source Review (NNSR) – a New Source Review permitting program for major sources in geographic areas that do not meet the National Ambient Air Quality Standards (NAAQS) set forth at 40 CFR Part 50. NNSR is designed to ensure that emissions associated with new or modified sources will be regulated with the goal of improving ambient air quality.

Organic Compound – any compound of carbon and another element. Examples: methane (CH₄), ethane (C₂H₆), carbon disulfide (CS₂).

Part 70 Operating Permit – also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507.

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APPENDIX B – GLOSSARY

PM₁₀ – particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – a New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Selective Catalytic Reduction (SCR) – A non-combustion control technology that destroys NO_x by injecting a reducing agent (e.g., ammonia) into the flue gas that, in the presence of a catalyst (e.g., vanadium, titanium, or zeolite), converts NO_x into molecular nitrogen and water.

Sulfur Dioxide (SO₂) – An oxide of sulphur.

TAP – LDEQ acronym for toxic air pollutants regulated under LAC 33 Part III, Chapter 51, Tables 1 through 3.

"Top Down" Approach – An approach which requires use of the most stringent control technology found to be technically feasible and appropriate based on environmental, energy, economic, and cost impacts.

Title V permit – see Part 70 Operating Permit.

Volatile Organic Compound (VOC) – any organic compound which participates in atmospheric photochemical reactions; that is, any organic compound other than those which the Administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.